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From: ROTH Sharon L. [sharon.l.roth@state.or.us]
Sent: Thursday, April 15, 2004 5:55 PM
To: 'mailto:ofccp-public@dol.gov'
Subject: Comments on Proposed amendment to 41 CFR Part 60-1. Applicant Definition Update

Per the proposed amendment to 41 CFR Part 60-1; definition of "applicant" where the internet and related electronic technologies were used, hopefully the amendments proposed by the inter-agency task force and the Office of Federal Contract Compliance Programs for the joint regulations of the selection guidelines can be wordsmithed to reveal a more "common interpretation." suggested changes/additions:

- the requirement that the job seeker follow the employer's standard procedure for submitting applications (if omitted it appears to leave employers with the obligation to consider job seekers regardless of whether the job seeker follows the rules for submitting applications)
- applications/resumes will be accepted for open recruitments only (unsolicited applications/resumes will NOT be retained) The current OFCC's proposal looks as if those employers who have federal contracts must retain "any and all electronic submissions" regardless of whether the job seeker meets the requirements of the 4-part test. This would create a tremendous record keeping burden.

Thanks.